

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (BRL)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation
of Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

GERTRUDE E. ALPERN REVOCABLE TRUST,
ROBERTA SCHWARTZ TRUST, PAUL
ALPERN RESIDUARY TRUST, LEWIS
ALPERN, in his capacity as successor
trustee of the Gertrude E. Alpern Revocable Trust,
as beneficiary of the Gertrude E. Alpern Revocable
Trust, as executor of the estate of Gertrude E.
Alpern, and in his capacity as trustee of the Paul
Alpern Residuary Trust, THE ESTATE OF
GERTRUDE E. ALPERN, JANE ALPERN, as
beneficiary of the Gertrude E. Alpern Revocable
Trust, JONATHAN SCHWARTZ, as beneficiary
of the Gertrude E. Alpern Revocable Trust, and,
ROBERTA SCHWARTZ, as beneficiary of the
Gertrude E. Alpern Revocable Trust, as settler and
beneficiary of the Roberta Schwartz Trust, and in
her capacity as trustee of the Roberta Schwartz
Trust,

Defendants.

Adv. Pro. No. 10-04327 (BRL)

STIPULATION OF SUBSTITUTION OF COUNSEL

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel that Chaitman LLP be and hereby is substituted as counsel of record to Defendants LEWIS ALPERN, in his capacity as successor trustee of the Gertrude E. Alpern Revocable Trust, as executor of the estate of Gertrude E. Alpern, and in his capacity as trustee of the Paul Alpern Residuary Trust, GERTRUDE E. ALPERN REVOCABLE TRUST (“Alpern Trust”), THE ESTATE OF GERTRUDE E. ALPERN (“Alpern Estate”), and the PAUL ALPERN RESIDUARY TRUST.

It is further stipulated to and agreed that this document may be executed in counterparts, which when taken together, shall constitute one original.

[SIGNATURE PAGE FOLLOWS]

Dated: New York, New York
November 3, 2015

KLESTADT WINTERS JURELLER
SOUTHARD & STEVENS, LLP
Outgoing Counsel

Dated: New York, New York
November 3, 2015

CHAITMAN LLP
Incoming Counsel

By: /s/ Brendan M. Scott

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*Former Attorneys for Defendants Lewis
Alpern, in his capacity as successor
trustee of the Gertrude E. Alpern
Revocable Trust, as executor of the
estate of Gertrude E. Alpern, and in his
capacity as trustee of the Paul Alpern
Residuary Trust Gertrude E. Alpern
Revocable Trust, The Estate of Gertrude
E. Alpern and Paul Alpern Residuary
Trust*

By: /s/ Helen Davis Chaitman

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*Attorneys for Defendants Lewis
Alpern in his capacity as successor
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Revocable Trust, as executor of the
estate of Gertrude E. Alpern, and in
his capacity as trustee of the Paul
Alpern Residuary Trust, the
Gertrude E. Alpern Revocable Trust,
The Estate of Gertrude E. Alpern
and Paul Alpern Residuary Trust*